

**EXHIBIT A**

Lehrer Declaration

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF DELAWARE**

In re:

FTX TRADING LTD., *et al.*,<sup>1</sup>

Reorganized Debtors.

Chapter 11

Case No. 22-11068 (JTD)

(Jointly Administered)

**Re: Docket No. 17634**

**DECLARATION OF MICHAEL LEHRER IN SUPPORT OF RESPONSE TO  
DEBTORS' FORTY-EIGHTH (SUBSTANTIVE) OMNIBUS OBJECTION TO CERTAIN  
OVERSTATED AND/OR PARTIALLY UNLIQUIDATED  
PROOFS OF CLAIM (CUSTOMER CLAIMS)**

I, Michael Lehrer, declare as follows:

1. I make and submit this declaration in support of the *Response of Claimant to Debtors' Forty-Eighth (Substantive) Omnibus Objection to Certain Overstated and/or Partially Unliquidated Proofs of Claim (Customer Claims)* (the "**Response**").<sup>2</sup>

2. Except as otherwise indicated, all facts set forth in this declaration are based on my personal knowledge, my communications with other members of the Debtors' employees, agents, and professionals, or my review of relevant documents.

3. Prior to the Petition Date, I held an account on the FTX US platform (the "**Main Account**"), which I used to purchase, sell, and transfer cryptocurrency and other digital assets whose trading was supported by the FTX US ecosystem. Prior to November 8, 2022, the balance of the Main Account, in US dollars, was approximately \$323,365.13.

---

<sup>1</sup> The last four digits of FTX Trading Ltd.'s and Alameda Research LLC's tax identification number are 3288 and 4063 respectively. Due to the large number of debtor entities in these Chapter 11 Cases, a complete list of the Debtors and the last four digits of their federal tax identification numbers is not provided herein. A complete list of such information may be obtained on the website of the Debtors' claims and noticing agent at <https://cases.ra.kroll.com/FTX>. The principal place of business of Debtor Emergent Fidelity Technologies Ltd is Unit 3B, Bryson's Commercial Complex, Friars Hill Road, St. John's, Antigua and Barbuda.

<sup>2</sup> Capitalized terms used but not otherwise defined herein shall have the meaning ascribed to such terms in the Response.

4. On or about November 8, 2022, I caused seven withdrawal requests, six of \$50,000 and one of \$23,365.13, (collectively, the “**Withdrawals**”) to be submitted through the FTX US platform, which requests, in the aggregate, sought to transfer substantially all of the currency held in the Main Account to a bank account held in my name. A true and correct copy of the relevant withdrawal history from the FTX US platform is attached hereto as Exhibit 1, with certain personal identifiable information redacted.

5. On or about November 8, 2022, I received seven confirmation emails from support@ftx.us, indicating that each of the Withdrawals had been “processed” and that the funds would be deposited into my bank account within three to five business days. True and correct copies of the (redacted) above-referenced confirmation emails are attached hereto as Exhibit 2.

6. On November 11, 2022 and November 14, 2022, the Debtors each filed a voluntary petition for relief under Chapter 11 of the United States Bankruptcy Code in the United States Bankruptcy Court for the District of Delaware.

7. From approximately March 31, 2023 to April 3, 2023 I exchanged numerous email communications with customer service for Circle (customer-support@circle.com), whom, upon information and belief, serve as ACH processor for FTX US customer transactions. The customer support representative informed me that none of the Withdrawals reached Circle, and were therefore, not processed. On or about June 25, 2024, I received official confirmation from Circle, in response to a follow-up inquiry regarding their investigation, that no evidence can be found of the Withdrawals taking place. A true and correct copy of my correspondence with Circle is attached hereto as Exhibit 3, with certain personal identifiable information redacted.

8. On or about April 3, 2023, in response to an inquiry submitted through the Consumer Financial Protection Bureau, I received a letter from Silvergate Bank (the “**Silvergate**

**Letter**”), with whom, upon information and belief, the Debtors hold a For Benefit Of (or “FBO”) Account relating to FTX US user funds. The Silvergate Letter states that “Silvergate did not receive a file containing that transactional request from FTX.US and therefore you did not receive the funds at your financial institution”. A true and correct copy of the Silvergate Letter is attached hereto as Exhibit 4, with certain personal identifiable information redacted.

9. As of the date hereof, I have not received any of the funds relating to the November 8, 2022 Withdrawals. True and correct copies of my redacted bank statements for the relevant period, showing that I have received no such funds, are attached hereto as Exhibit 5.

Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury that the foregoing statements are true and correct to the best of my knowledge, information, and belief.

Executed on this 26<sup>th</sup> day of June 2024

/s/ Michael Lehrer

Michael Lehrer

**EXHIBIT 1**

Claimant's Withdrawal History

FTX

[Privacy](#)
[FAQ](#)
[Support](#)

English

[My Account](#)

STEP 1

Initiate Account Owner Authentication

STEP 2

Verify Identity of the Original FTX Account Owner

STEP 3

KYC

STEP 4

Review Account Balances

View your FTX account -- you can view your balances as of the Petition Date (unless otherwise noted), and historical activity.

STEP 5

Submission of Electronic Proof of Claim

STEP 6

Standby for Next Steps

Portfolio

Main Account

Total Customer Entitlement Claim (USD): \$1.68

[Balances](#)
[Deposits](#)
[Withdrawals](#)
[Positions](#)
[Fills](#)
[P2P Transfers](#)
[Airdrops](#)

Withdrawals

| Time                    | Coin       | Amount                          | Destination    |
|-------------------------|------------|---------------------------------|----------------|
| 11/11/2022, 10:48:26 AM | USDP       | 1.67977275<br>USDP (1 USDP fee) |                |
| 11/10/2022, 10:36:31 PM | USDC       | 1.67977275<br>USDC              | coinbase_matic |
| 11/9/2022, 1:23:39 PM   | USDC       | 2.00538746<br>USDC              | coinbase_matic |
| 11/8/2022, 7:23:36 PM   | USD (fiat) | 23,365.13<br>USD (2.00 USD fee) | Bank transfer  |
| 11/8/2022, 7:23:03 PM   | USD (fiat) | 50,000<br>USD (2.00 USD fee)    | Bank transfer  |
| 11/8/2022, 7:22:45 PM   | USD (fiat) | 50,000<br>USD (2.00 USD fee)    | Bank transfer  |
| 11/8/2022, 7:22:20 PM   | USD (fiat) | 50,000<br>USD (2.00 USD fee)    | Bank transfer  |
| 11/8/2022, 2:55:54 PM   | USD (fiat) | 50,000<br>USD (2.00 USD fee)    | Bank transfer  |
| 11/8/2022, 2:24:26 PM   | USD (fiat) | 50,000<br>USD (2.00 USD fee)    | Bank transfer  |
| 11/8/2022, 2:04:36 PM   | USD (fiat) | 50,000<br>USD (2.00 USD fee)    | Bank transfer  |

Rows per page: 10

1-10 / 12

Account ID

Unique Customer Code

Email

Platform FTX\_US

Settings

Logout

**EXHIBIT 2**

FTX Withdrawal Confirmation Emails

FTX US fiat withdrawal sent ➤ Inbox x



FTX US <support@ftx.us>  
to me ▾

Tue, Nov 8, 2:06 PM (10 days ago) ☆ ↶ ⋮

Hello Michael Lehrer,

Your fiat withdrawal of 50000.00 USD has been processed. Please allow three to five business days for the transfer to arrive in your bank account.



FTX US <support@ftx.us>  
to me ▾

Tue, Nov 8, 2:25 PM (10 days ago) ☆ ↶ ⋮

...

Hello Michael Lehrer,

Your fiat withdrawal of 50000.00 USD has been processed. Please allow three to five business days for the transfer to arrive in your bank account.



FTX US <support@ftx.us>  
to me ▾

Tue, Nov 8, 2:55 PM (10 days ago) ☆ ↶ ⋮

...

Hello Michael Lehrer,

Your fiat withdrawal of 50000.00 USD has been processed. Please allow three to five business days for the transfer to arrive in your bank account.



FTX US <support@ftx.us>  
to me ▾

Tue, Nov 8, 7:22 PM (10 days ago) ☆ ↶ ⋮

...

Hello Michael Lehrer,

Your fiat withdrawal of 50000.00 USD has been processed. Please allow three to five business days for the transfer to arrive in your bank account.



FTX US <support@ftx.us>  
to me ▾

Tue, Nov 8, 7:22 PM (10 days ago) ☆ ↶ ⋮

...


Hello Michael Lehrer,

Your fiat withdrawal of 50000.00 USD has been processed. Please allow three to five business days for the transfer to arrive in your bank account.

New Message ✕ ↶ ✎



---

 **FTX US** <support@ftx.us>  
to me ▾  


...

Tue, Nov 8, 7:23 PM (10 days ago) ☆ ↶ ⋮

Hello Michael Lehrer,

Your fiat withdrawal of 50000.00 USD has been processed. Please allow three to five business days for the transfer to arrive in your bank account.

---

 **FTX US** <support@ftx.us>  
to me ▾

Tue, Nov 8, 7:23 PM (10 days ago) ☆ ↶ ⋮

Hello Michael Lehrer,

Your fiat withdrawal of 23365.13 USD has been processed. Please allow three to five business days for the transfer to arrive in your bank account.

↶ Reply

↷ Forward

**EXHIBIT 3**

ACH Processor Correspondence



Michael Lehrer &lt;[REDACTED]@gmail.com&gt;

---

## Missing ACH USD Transfers from FTX.US , Requesting Investigation

---

Michael Lehrer <[REDACTED]@gmail.com>  
To: customer-support@circle.com

Fri, Mar 31, 2023 at 11:45 AM

Hello,

On November 8th, 2022, I initiated seven USD ACH withdrawals on [FTX.US](#). Those transactions were all marked as completed by [FTX.US](#), and I received e-mail confirmation they would be received in 3-5 business days. However, the transactions were never received.

The FTX bankruptcy team has let me know that my claim status is showing these transactions as sent off, meaning they do not show the transactions as returned to them (my [FTX.US](#) current balance is showing as \$1.60).

Can you please check your records to see if my USD ACH withdrawals were ever initiated? Below you will find the information needed to do your investigation. Please note that all seven of the transactions had a \$2 transaction fee, so the amount may have been for \$2 less on each. (Please see attached screenshot illustrating this).

Name: Michael Lehrer

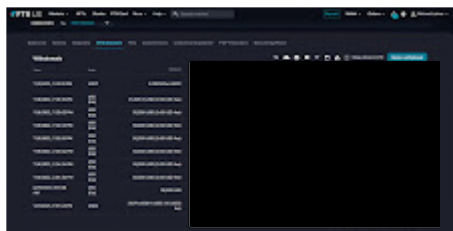
E-mail on [FTX.US](#) account: [REDACTED]@gmail.com

ACH Transfer 1: \$50,000, 11/8/22, 2:04:36 PM EST  
ACH Transfer 2: \$50,000, 11/8/22, 2:24:26 PM EST  
ACH Transfer 3: \$50,000, 11/8/22, 2:55:54 PM EST  
ACH Transfer 4: \$50,000, 11/8/22, 7:22:20 PM EST  
ACH Transfer 5: \$50,000, 11/8/22, 7:22:45 PM EST  
ACH Transfer 6: \$50,000, 11/8/22, 7:23:03 PM EST  
ACH Transfer 7: \$23,365.13, 11/8/22, 7:23:36 PM EST

Bank: Bank of America  
Last 4 Bank Account Digits: 6505

Thank you very much for your assistance and let me know if you need any more information.

Michael



webUI\_ftx\_us\_withdrawals.JPG  
256K



Michael Lehrer <[REDACTED]@gmail.com>

---

## Missing ACH USD Transfers from FTX.US , Requesting Investigation

---

**Customer Support** <customer-support@circle.com>

Fri, Mar 31, 2023 at 9:43 PM

To: "[REDACTED]@gmail.com" <[REDACTED]@gmail.com>

Hi Michael,

We apologize for the experience you had with FTX. I will escalate your case to our internal team to investigate further. We will keep you updated if Circle has received the transaction and, if it was received, the transaction's current status.

**Best**

Luke Ong

Customer Care Representative

[Quoted text hidden]



Michael Lehrer <[REDACTED]@gmail.com>

---

## Missing ACH USD Transfers from FTX.US , Requesting Investigation

---

**Customer Support** <customer-support@circle.com>

Mon, Apr 3, 2023 at 11:31 AM

To: "[REDACTED]@gmail.com" <[REDACTED]@gmail.com>

Hi Michael,

Regretfully, we cannot locate the transaction you are referring to. The ACH withdrawal request did not reach Circle to be processed. We apologize for any inconvenience this may have caused.

[Quoted text hidden]



Michael Lehrer <[REDACTED]@gmail.com>

---

## Missing ACH USD Transfers from FTX.US , Requesting Investigation

---

Michael Lehrer <[REDACTED]@gmail.com>

Mon, Apr 3, 2023 at 11:44 AM

To: Customer Support <customer-support@circle.com>

Hello,

Thank you for your response and assistance. I just want to clarify, there were 7 different transactions, are you saying you don't have a record of any of the 7 in your ACH system?

Thanks

Michael

[Quoted text hidden]



Michael Lehrer <[REDACTED]@gmail.com>

---

## Missing ACH USD Transfers from FTX.US , Requesting Investigation

---

**Customer Support** <customer-support@circle.com>

Mon, Apr 3, 2023 at 3:56 PM

To: "[REDACTED]@gmail.com" <[REDACTED]@gmail.com>

Hi Michael,

That is correct -- our team was unable to locate the ACH wires in question with information you provided. If the information provided was incorrect, please let us know (Bank of America; Last 4 Digits: 6505).

I apologize for the inconvenience here, but please let us know if you have any additional questions.

**Sergio N.**

Customer Care Advisor

[Circle Internet Financial, LLC](#)

[View our Help Center here!](#)

----- Original Message -----

**From:** Michael Lehrer ([REDACTED]@gmail.com)

**Sent:** 4/3/2023, 11:44 AM

**To:** [customer-support@circle.com](mailto:customer-support@circle.com)

**Subject:** Re: Missing ACH USD Transfers from FTX.US , Requesting Investigation

Hello,

Thank you for your response and assistance. I just want to clarify, there were 7 different transactions, are you saying you don't have a record of any of the 7 in your ACH system?

Thanks

Michael

[Quoted text hidden]

[Quoted text hidden]

[Quoted text hidden]



Michael Lehrer &lt;[REDACTED]@gmail.com&gt;

---

## Missing ACH USD Transfers from FTX.US , Requesting Investigation

---

**Customer Support** <customer-support@circle.com>

Tue, Jun 25, 2024 at 3:51 PM

To: "[REDACTED]@gmail.com" &lt;[REDACTED]@gmail.com&gt;

Hello Michael,

Thank you for contacting Circle Customer Care.

We've reviewed your request again and our team has completed their investigation. Our team has **not found any evidence** of the following transactions taking place with Circle:

- ACH Transfer 1: \$50,000, 11/8/22, 2:04:36 PM EST
- ACH Transfer 2: \$50,000, 11/8/22, 2:24:26 PM EST
- ACH Transfer 3: \$50,000, 11/8/22, 2:55:54 PM EST
- ACH Transfer 4: \$50,000, 11/8/22, 7:22:20 PM EST
- ACH Transfer 5: \$50,000, 11/8/22, 7:22:45 PM EST
- ACH Transfer 6: \$50,000, 11/8/22, 7:23:03 PM EST
- ACH Transfer 7: \$23,365.13, 11/8/22, 7:23:36 PM EST

We cannot provide a formal letterhead, however, you may consider this email as official confirmation from Circle Internet Financial.

Best regards,

**Circle Customer Care**

[Circle Internet Financial, LLC](#)

[View our Help Center here!](#)

----- Original Message -----

**From:** Michael Lehrer [REDACTED]@gmail.com]

**Sent:** 6/22/2024, 2:39 PM

**To:** [customer-support@circle.com](mailto:customer-support@circle.com)

**Subject:** Re: Missing ACH USD Transfers from [FTX.US](#) , Requesting Investigation

[Quoted text hidden]



**EXHIBIT 4**

Silvergate Letter

April 3, 2023

Michael Lehrer

[REDACTED]  
[REDACTED]  
[REDACTED]@gmail.com

Re: Silvergate Bank Complaint # 230330-10736660

Dear Lehrer:

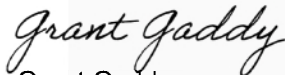
We are in receipt of the above-referenced complaint, received from the Consumer Financial Protection Bureau (CFPB) on March 31, 2023. In the complaint you state that on November 8, 2022, you submitted multiple requests on the FTX.US platform to withdraw a total of \$323,365.13 from your account at FTX.US, an online crypto investment platform, to be transferred to your account at Bank of America. According to your complaint, you are requesting Silvergate investigate the withdrawal requests and release the funds.

Upon receipt of the complaint, Silvergate researched its records related to the provided information. To provide clarity, when requests to withdraw funds from the FTX.US platform are submitted, the transactional details including the time of request, amount, receiving bank, and your specific account to be credited are not automatically received and processed by Silvergate. In fact, some of these transaction details aren't available to Silvergate at all.

What Silvergate can speak to are the transactions that FTX.US did provide to Silvergate to process. Although you requested a withdrawal through the FTX.US platform, Silvergate did not receive a file containing that transactional request from FTX.US and therefore you did not receive the funds at your financial institution.

Silvergate expresses regret at the situation, however, we cannot confirm, nor do we have knowledge of each request for withdrawal made on the FTX platform and can only process transaction we are actually provided and authorized to by FTX.US. Further, Silvergate has no way of determining whether funds held in an omnibus account can be attributed to you, as Silvergate does not have the ability to view or access the accountholder balance information of FTX.US customers. Accordingly, this matter should be settled directly with FTX.US.

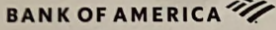
Sincerely,



Grant Gaddy  
Compliance Manager  
Silvergate Bank

**EXHIBIT 5**

Bank Statements



BANK OF AMERICA, N.A. (THE "BANK")

Transaction  
History

MICHAEL J LEHRER

ADV RELATIONSHIP BANKING

\*\*\*\* \* 6505

Bank of America  
Buckhead Financial  
3116 Peachtree Road NE  
Atlanta, GA 30305

Last Posting Date 06/21/2024

Date/Time Printed 6/24/2024 2:42 PM EST

**Since Last Statement Summary**

Last Statement Date 05/24/2024

Balance Last Statement (\$)

Deposits/Credits (+) # 5

Withdrawals/Debits (-) # 14

Available Balance (\$)

#Counts include posted items only-Intraday items are not included in the counts

Balance Last Statement, Deposits/Credits, Withdrawals/Debits may not total to Available Balance.

| Date                              | Description                              | DES:    | ID:        | INDN:                          | CO ID:     | Type     | Amount      | Available Balance |
|-----------------------------------|--|---------|------------|--------------------------------|------------|----------|-------------|-------------------|
| 12/28/2022                        | VENMO PPD                                | CASHOUT | [REDACTED] | MICHAEL LEHRER                 | [REDACTED] | Deposit  | \$0.01      | \$0.00            |
| 12/27/2022                        | VENMO PPD                                | CASHOUT | [REDACTED] | MICHAEL LEHRER                 | [REDACTED] | Deposit  | \$4,999.99  | \$0.00            |
| Statement Period as of 12/24/2022 |  |         |            |                                |            |          |             |                   |
| 12/23/2022                        | Interest Earned                          |         |            |                                |            | Credit   | \$0.18      | \$0.00            |
| 12/23/2022                        | RINGCRUSH, LLC                           | PAYROLL | [REDACTED] | MICHAEL LEHRER                 | CO         | Deposit  | \$445.97    | \$0.00            |
| 12/23/2022                        | Online Banking Transfer Conf# im8ujnvya; |         |            | CHRISTENBURY LEHRER, ELIZABETH |            | Transfer | \$25,000.00 | \$0.00            |
| 12/22/2022                        | Online Banking Transfer Conf# bzsstzr3q; |         |            | CHRISTENBURY LEHRER, ELIZABETH |            | Transfer | \$25,000.00 | \$0.00            |

For additional information or service, please contact the Customer Service Center at 1-800-432-1000

\* = Item(s) included in Previous Statement(s).

\*\*\*\* \* 6505

00-14-9036M 11-2010  
NTX

Page 1

| Date                              | Description  | Type     | Amount      | Available Balance |
|-----------------------------------|--|----------|-------------|-------------------|
| 12/19/2022                        | Zelle Transfer Conf# c9dravt3; LEHRER, SUSAN                                       | Transfer | \$100.00    | \$0.00            |
| 12/16/2022                        | RINGCRUSH, LLC DES:PAYROLL [REDACTED] IDN:MICHAEL LEHRER CO                        | Deposit  | \$445.97    | \$0.00            |
| 12/15/2022                        | Binance.US DES:Binance.US ID: [REDACTED] IDN:MICHAEL JOHN SANDERS L CO             | Deposit  | \$10,000.00 | \$0.00            |
| 12/13/2022                        | Binance.US DES:Binance.US ID: [REDACTED] IDN:MICHAEL JOHN SANDERS L CO             | Deposit  | \$10,000.00 | \$0.00            |
| 12/09/2022                        | RINGCRUSH, LLC DES:PAYROLL ID: [REDACTED] IDN:MICHAEL LEHRER CO                    | Deposit  | \$445.97    | \$0.00            |
| 12/08/2022                        | VENMO DES:CASHOUT ID: [REDACTED] IDN:MICHAEL LEHRER CO ID: [REDACTED]              | Deposit  | \$55.00     | \$0.00            |
| 12/02/2022                        | RINGCRUSH, LLC DES:PAYROLL ID: [REDACTED] IDN:MICHAEL LEHRER CO                    | Deposit  | \$445.97    | \$0.00            |
| 11/29/2022                        | PAYPAL DES:TRANSFER ID: [REDACTED] IDN:MICHAEL LEHRER CO ID: [REDACTED]            | Deposit  | \$146.66    | \$0.00            |
| 11/25/2022                        | RINGCRUSH, LLC DES:PAYROLL ID: [REDACTED] IDN:MICHAEL LEHRER CO                    | Deposit  | \$445.97    | \$0.00            |
| Statement Period as of 11/24/2022 |  |          |             |                   |
| 11/21/2022                        | Zelle Transfer Conf# phd3lr673; LEHRER, SUSAN                                      | Transfer | \$100.00    | \$0.00            |
| 11/21/2022                        | Coinbase.com DES: [REDACTED] ID: [REDACTED] IDN:MICHAEL J LEHRER CO                | Deposit  | \$58,981.85 | \$0.00            |
| 11/18/2022                        | RINGCRUSH, LLC DES:PAYROLL ID: [REDACTED] IDN:MICHAEL LEHRER CO                    | Deposit  | \$445.97    | \$0.00            |
| 11/16/2022                        | Coinbase.com DES: [REDACTED] ID: [REDACTED] IDN:MICHAEL J LEHRER CO ID: [REDACTED] | Deposit  | \$10,000.00 | \$0.00            |
| 11/14/2022                        | Coinbase.com DES: [REDACTED] ID: [REDACTED] IDN:MICHAEL J LEHRER CO ID: [REDACTED] | Deposit  | \$30,000.00 | \$0.00            |

For additional information or service, please contact the Customer Service Center at 1-800-432-1000

\*\*\*\* 6505

\* = Item(s) included in Previous Statement(s).

NTX



| Date       | Description  | Type    | Amount   | Available Balance |
|------------|--|---------|----------|-------------------|
| 11/10/2022 | RINGCRUSH, LLC DES:PAYROLL ID: [REDACTED] INDN:MICHAEL LEHRER CO | Deposit | \$445.97 | \$0.00            |
| 11/04/2022 | RINGCRUSH, LLC DES:PAYROLL ID: [REDACTED] INDN:MICHAEL LEHRER CO | Deposit | \$445.97 | \$0.00            |

Statement Period as of 10/26/2022

Bank of America, N.A.  
Buckhead Financial Center  
3116 Peachtree Rd NE  
Atlanta, GA 30305

\*\*\*No More Activity For This Account\*\*\*

For additional information or service, please contact the Customer Service Center at 1-800-432-1000

\* = Item(s) included in Previous Statement(s).

NTX

\*\*\*\* 6505

Page 3